

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

CRIMINAL NO. 12 CR 3182 JB

vs.

CHRISTOPHER ROYBAL et. al.,

Defendants.

AMENDED UNOPPOSED MOTION TO AMEND SCHEDULING ORDER

COME NOW, the defendants by and through their counsel of record and hereby request this Honorable Court amend the previously filed scheduling Order, and as grounds therefore state as follows:

1. On February 11, 2013, this Court issued a scheduling order in the above captioned cause.
2. Given the complexity of this case, the Court declared this case to be complex under 18 U.S.C. § 3161(h)(7)(B)(ii). The Court found that there exists good cause to set aside the standard discovery and motion schedule, and to establish an alternative discovery and motion schedule as agreed by the parties.
3. The government continues to disclose discovery material.
4. Counsel for defendants have been diligently reviewing the voluminous discovery disclosed in the case.

5. Counsel anticipate that additional time is needed in order to complete a thorough review of the discovery, conduct their due diligence and prepare the appropriate pre-trial motions.

6. The parties are in agreement that the dates established in the proposed amended order should permit the parties to effectively prepare pre-trial motions, prepare for and bring this case to trial as determined by the Court.

7. Assistant U.S Attorneys Joel R. Meyers and Shana Long advised the government does not oppose the issuance of an amended scheduling order, extending the current deadlines as proposed in the amended scheduling order.

8. Jacquelyn Robins, counsel for Christopher Roybal, concurs in a motion to amend the current scheduling order.

9. Jason Bowles, counsel for Jerome Eckstein, concurs in a motion to amend the current scheduling order.

10. Samuel Winder, counsel for George Roybal, concurs in a motion to amend the current scheduling order.

11. B.J. Crow, counsel for Cesar Ramirez, concurs in a motion to amend the current scheduling order.

12. Summer Mckeivier, counsel for Manuel Valencia, concurs in a motion to amend the current scheduling order.

13. Gregory Acton, counsel for Erick Vigil, concurs in a motion to amend the current scheduling order.

14. Penni Adrian, counsel for Paul Ulibarri, concurs in a motion to amend the current scheduling order.

15. Monnica L. Garcia, counsel for Isaac Gonzales, concurs in a motion to amend the current scheduling order.

16. Angela Arellanes, counsel for Chase Cameron, concurs in a motion to amend the current scheduling order.

17. Edward O. Bustamante, counsel for Jose Lopez, concurs in a motion to amend the current scheduling order.

18. Edward Chavez Jr., counsel for Anthony Padilla, concurs in a motion to amend the current scheduling order.

19. Michael Davis, counsel for Michelle Johnson, concurs in a motion to amend the current scheduling order.

20. Mark Earnest, counsel for Kristen Lucero, concurs in a motion to amend the current scheduling order.

21. Leon F. Howard III, counsel for Tianna Candelaria, concurs in a motion to amend the current scheduling order.

22. Phillip Sapien, counsel for Jairus Granado, concurs in a motion to amend the current scheduling order.

23. Molly Schmidt-Nowara, counsel for Brandy Lucero, concurs in a motion to amend the current scheduling order.

WHEREFORE, for the foregoing reasons, Counsel for defendants respectfully request that the Court approve and adopt the attached amended proposed Case Scheduling Order.

Respectfully submitted,

Electronically filed 12/26/13
Erlinda O. Johnson
Attorney for Richard Sanchez
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Albuquerque, NM 87102
505-792-4048

I hereby certify that a true and correct
Copy of the foregoing was provided
To counsel for the government and counsel
For co-defendants on this _26th day
of December, 2013.

_____/s/_____
Erlinda O. Johnson
Attorney at Law